

Saskowski, Ronald

From: Miller, Scott
Sent: Thursday, July 16, 2015 6:28 AM
To: Saskowski, Ronald
Subject: FW: SMS Draft ERA Comments

Hello Ron,
Please save this to SEMS for Smokey Mountain Smelters.
Thank you,
Scott

From: Austin, Janice [<mailto:Jaustin@versar.com>]
Sent: Wednesday, July 15, 2015 7:45 AM
To: Miller, Scott; Thomas, Brett
Cc: Kestle, Rusty
Subject: RE: SMS Draft ERA Comments

Hi Scott,

Thanks Scott for the clarification. We will finalize the ERA without change and add the following text to the FS as part of the cap remedy.

Based on ecological risks for copper, 4,075 cubic yards of soils outside the source areas (specifically surface soils from 100-ft by 100-ft grids H05, H07, I04, F08, G06, J03, K04, L04, M05, N04, N05) will require remediation.

As discussed, no additional edits to figures will be completed at this time.

Janice

From: Miller, Scott [<mailto:Miller.Scott@epa.gov>]
Sent: Tuesday, July 14, 2015 10:27 AM
To: Austin, Janice; Thomas, Brett
Cc: Kestle, Rusty
Subject: RE: SMS Draft ERA Comments

Good morning, Janice,
I've had the opportunity to discuss this item with Dr. Thomas, and we discussed why there was a suggested approach to deal with potential ecological risk through adaptive risk management or in the alternative through a revision to the baseline ecological risk assessment. Dr. Thomas correctly pointed out that we did come to the conclusion that remediation action was not warranted due to poor habitat and conservative exposure assumptions. However, since the Site has been cleared, it actually functions as an excellent habitat for song birds, such as the Robin, who now will utilize it even further since it has been deforested, and it is more available to access for them.

Attached to this email is a memorandum from Dr. Thomas that details the concern and provides two suggested approaches for addressing the concern. After discussion in-house with Dr. Thomas and Rusty, we believe that the ideal approach here is to accept the risk management approach of removing the top foot of the soil identified in the parcels included in this memorandum and placing those soils under the engineered cap that will be part of the overall remedy.

I apologize for my inability to accurately convey these points in our call yesterday. In summary, we will simply take that assumption forward into planning for remedial design purposes. At this point, we believe that a conference call on this point is unnecessary.

Thank you,
Scott Miller

From: Austin, Janice [<mailto:Jaustin@versar.com>]

Sent: Monday, July 13, 2015 4:04 PM

To: Thomas, Brett

Cc: Miller, Scott; Kestle, Rusty

Subject: SMS Draft ERA Comments

Based on comments from EPA, it appears to be related to the FS based on Cu surface soil concentrations. The recommendations in the ERA were that remediation action was not warranted due to poor habitat and conservative exposure assumptions, even though minimal risk was observed based on exposure modeling.

If amenable, I'd like to schedule a call in the morning to discuss.

Janice